

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-08139-MJ-MATTHEWMAN

UNITED STATES OF AMERICA,

vs.

SADIN MIGUEL TINEO SANTANA,

Defendant.

**UNOPPOSED MOTION OF SADIN MIGUEL TINEO SANTANA TO CONTINUE
DETENTION HEARING**

COMES NOW the Defendant, SADIN MIGUEL TINEO SANTANA (the “Defendant”), by and through undersigned counsel, to move this Court for an Order continuing the detention hearing of the Defendant for a period of six days to Tuesday, March 25, 2025, and in support states the following:

1. The Defendant had his initial appearance on March 17, 2025. At that time, the Court appointed undersigned counsel pursuant to the Criminal Justice Act to represent Mr. Tineo Santana. The detention hearing is scheduled for March 19, 2025. Counsel has not had an opportunity to discuss the case with Mr. Tineo Santana since counsel’s assignment this morning. Additionally, counsel will be in Fort Pierce tomorrow on the case of *United States v. Kaiser*, 24-CR-80069-Cannon/McCabe, and will not have an opportunity to meet with the Defendant before tomorrow evening at the earliest. Moreover, counsel has a previously scheduled appointment to take his 97-year-old mother-in-law to a medical appointment on the morning of March 19, 2025. Thus, counsel requires additional time to ensure his ability to meet with his client, discuss the case, and prepare for the scheduled detention hearing.

2. Counsel for the Defendant has contacted Jonathan Bailyn, the Assistant United States' Attorney assigned to prosecute this case. Mr. Bailyn has advised that the government has no objection to the granting of the relief requested by this motion.

3. Counsel understands that counsel for a co-defendant, Jermaine Williams, has requested a continuance until March 25, 2025, for Mr. Williams's detention hearing. To save government and judicial resources, Mr. Tineo Santana requests that the Court schedule his detention hearing on the same date.

4. Counsel makes this request in good faith, and it is not intended for the purpose of obstruction or delay. Moreover, such a continuance would not prejudice any party to the litigation.

WHEREFORE, for the reasons set forth above, Defendant SADIN MIGUEL TINEO SANTANA respectfully requests that the Honorable Court grant this Motion and enter an Order continuing the detention hearing for six days to March 25, 2025.

Respectfully submitted,

/s/ Richard A. Serafini
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically via CM/ECF this 17th day of March 2024.

/s/ Richard A. Serafini
Richard A. Serafini, Esq.